

EXHIBIT A

Massachusetts Maritime Academy
Police Department



CHRISTOPHER SLATTERY
CHIEF OF POLICE

101 Academy Drive - Bourne, Massachusetts 02532
Phone: (508) 830-5000 EXT 5060
Address all communications to Chief of Police
Fax: 508-830-5061

NOTICE OF TRESPASS

DATE: 09/10/2021
NAME: Jeffrey B Hagopian
ADDRESS: 4 Checkerberry lane
Chelmsford Ma 01824

Be advised that you are hereby **prohibited from entering onto any lands or buildings, which constitute the Massachusetts Maritime Academy, nor any of its ships or boats** for any reason. If you are found attempting such, you may be subject to arrest or summonsed to court through the **FALMOUTH DISTRICT COURT** for trespassing in accordance with the Massachusetts General Law, Chapter 266 § 120.

A copy of this notice will be on file at the Massachusetts Maritime Academy Police Department.

This notice is being served to you in hand and/or sent to you pursuant to Massachusetts General Laws, Chapter 266 § 120. A copy of the statute is attached

CALL#: 21-11037

RETURN RECEIPT#

SIGNED: _____

PRINTED NAME: _____

Date: _____

Issuing Officer: *Chatter*

Part IV	CRIMES, PUNISHMENTS AND PROCEEDINGS IN CRIMINAL CASES
Title I	CRIMES AND PUNISHMENTS
Chapter 266	CRIMES AGAINST PROPERTY
Section 120	ENTRY UPON PRIVATE PROPERTY AFTER BEING FORBIDDEN AS TRESPASS; PRIMA FACIE EVIDENCE; PENALTIES; ARREST; TENANTS OR OCCUPANTS EXCEPTED

Section 120. Whoever, without right enters or remains in or upon the dwelling house, buildings, boats or improved or enclosed land, wharf, or pier of another, or enters or remains in a school bus, as defined in section 1 of chapter 90, after having been forbidden so to do by the person who has lawful control of said premises, whether directly or by notice posted thereon, or in violation of a court order pursuant to section thirty-four B of chapter two hundred and eight or section three or four of chapter two hundred and nine A, shall be punished by a fine of not more than one hundred dollars or by imprisonment for not more than thirty days or both such fine and imprisonment. Proof that a court has given notice of such a court order to the alleged offender shall be prima facie evidence that the notice requirement of this section has been met. A person who is found committing such trespass may be arrested by a sheriff, deputy sheriff, constable or police officer and kept in custody in a convenient place, not more than twenty-four hours,

Sunday excepted, until a complaint can be made against him for the offence, and he be taken upon a warrant issued upon such complaint.

This section shall not apply to tenants or occupants of residential premises who, having rightfully entered said premises at the commencement of the tenancy or occupancy, remain therein after such tenancy or occupancy has been or is alleged to have been terminated. The owner or landlord of said premises may recover possession thereof only through appropriate civil proceedings.

MMAPD
101 Academy dr
Boszards Bay Ma 025

CERTIFIED MAIL



7019 0160 0000 7696 2712

PROVIDENCE RI 028
13 SEP 2021 PM 3 L



U.S. POSTAGE® FIVE DOLLARS
ZIP 02532 \$007.33⁰
02-4H
0000359547 SEP 10 2021

Jeffrey Hagopian
4 Checkerberry lane
Chelmsford Ma 01824

01824-111704



EXHIBIT B



The Commonwealth's
Leadership University

Christopher Slattery <cslattery@maritime.edu>

Notice of Trespass - Jeffrey B. Hagopian/Call # 21-11037

1 message

Thu, Sep 16, 2021 at 11:31 AM

jeff hagopian <jbhagop@yahoo.com>

To: cslattery@maritime.edu

Cc: "Jeffrey B. Hagopian" <jbhagop@yahoo.com>

Good morning Chief Slattery,

Yesterday, September 15, 2021, I received a "Notice Of Trespass" from the Massachusetts Maritime Academy. This notice is signed by you.

Please tell me why you sent this and why I am the subject of your "no trespass" order.
I look forward to hearing from you.

Sincerely & respectfully,

Captain Jeffrey B. Hagopian
Massachusetts Maritime Academy - Class of 1988
Cell: 978-764-3908
Email: jbhagop@yahoo.com

EXHIBIT C



The Commonwealth's
Leadership University

Christopher Slattery <cslattery@maritime.edu>

Official Report of Threat/Request for Investigation

1 message

jeff hagopian <jbhagop@yahoo.com>

Thu, Sep 16, 2021 at 11:47 AM

To: cslattery@maritime.edu

Cc: "Jeffrey B. Hagopian" <jbhagop@yahoo.com>

Dear Chief Slattery,

This email is to inform that this past Thursday, September 9, 2021 I was in attendance at MMA for a presentation titled "A Survivor's Story." The presentation was at Admiral's Hall from 7:00 p.m. to 9:00 p.m.

After the presentation was over I was having a conversation with MMA Board of Trustee Member and MMA Foundation Board Member Geoffrey Wilkinson. In the course of our conversation Mr. Wilkinson stated to me words to the effect of the following: "If you keep pushing this things are not going to end well for you." I consider such a statement to be a serious threat to me and was completely uncalled for.

As the Chief of Police for the Massachusetts Maritime Academy I am respectfully requesting that you commence an investigation into this matter.

Thank you, Chief Slattery.

Sincerely & respectfully,

Captain Jeffrey B. Hagopian
Massachusetts Maritime Academy - Class of 1988
Cell: 978-764-3908
Email: jbhagop@yahoo.com

EXHIBIT D



The Commonwealth's
Leadership University

Christopher Slattery <cslattery@maritime.edu>

2nd Request - Official Report of Threat/Request for Investigation

1 message

jeff hagopian <jbhagop@yahoo.com>

Thu, Sep 30, 2021 at 10:39 AM

To: cslattery@maritime.edu

Cc: "Jeffrey B. Hagopian" <jbhagop@yahoo.com>

Good morning Chief Slattery,

I sent the below email to you two weeks ago and have received no response from you. I am sending the below again as my second request and would respectfully request that you please acknowledge receipt of this email.

Thank you, Chief.

Sincerely & respectfully,

Captain Jeffrey B. Hagopian
Massachusetts Maritime Academy - Class of 1988
Cell: 978-764-3908
Email: jbhagop@yahoo.com

Dear Chief Slattery,

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Thank you, Chief Slattery.

Sincerely & respectfully,

Captain Jeffrey B. Hagopian
Massachusetts Maritime Academy - Class of 1988
Cell: 978-764-3908
Email: jbhagop@yahoo.com

EXHIBIT E

The Commonwealth's



Leadership University™

October 6, 2021

Mr. Jeffrey B. Hagopian
4 Checkerberry Lane
Chelmsford, MA 01824

Via electronic mail

Re: *Public Record Request sent to Massachusetts Maritime Academy*

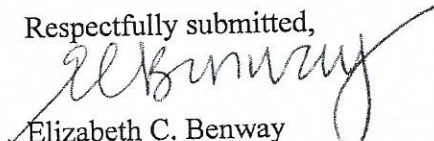
Dear Mr. Hagopian,

Massachusetts Maritime Academy ("MMA") has received your public record request submitted on October 1, 2021. Specifically, you requested MMA to provide you with "any and all documentation as it pertains to this "no trespass" order. This includes but is not limited to any and all written (handwritten letters/notes etc), oral, electronic (i.e. text messages, emails and/or fax) documentation as it pertains to this "no trespass" order and, in addition, the specific details as to why this "no trespass" order was issued to [me]."

MMA responds to your request consistent with the Public Records Law and its Regulations. Attached please find:

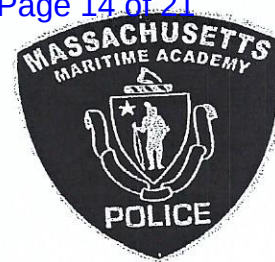
1. Notice of Trespass/Hagopian/09102021
2. Certified Mail Receipt/Hagopian/09132021
3. Wilkinson letter/09132021
4. Email/Hagopian/09162021/Notice of Trespass
5. Email/Hagopian/09162021/Official Report of Threat
6. Email/Hagopian/09302021

Respectfully submitted,


Elizabeth C. Benway
Public Records Access Officer

Massachusetts Maritime Academy

Police Department



CHRISTOPHER SLATTERY
CHIEF OF POLICE

101 Academy Drive • Bourne, Massachusetts 02532
Phone: (508) 830-5000 EXT 5060
Address all communications to Chief of Police
Fax: 508-830-5081

NOTICE OF TRESPASS

DATE: 09/10/2021
NAME: Jeffrey B Hagopian
ADDRESS: 4 Checkerberry lane
Chelmsford Ma 01824

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SIGNED: _____

CALL#: 21-11037

PRINTED NAME: _____

RETURN RECEIPT#

Date: _____

Issuing Officer: _____

CERTIFIED MAIL

MMARD
101 Academy Dr
Bozards Bay Ma 025



7019 0160 0000 7696 2712

PROVIDENCE RI 028
13 SEP 2021 PM 3:11



U.S. POSTAGE
\$0.0733
ZIP 02832
02 SEP 2021

Jeffrey Hagopian
4 Checkerberry Lane
Chelmsford Ma 01824

01824-111704





The Commonwealth's
Leadership University

Christopher Slattery <cslattery@maritime.edu>

Notice of Trespass - Jeffrey B. Hagopian/Call # 21-11037

1 message

Thu, Sep 16, 2021 at 11:31 AM

jeff hagopian <jbhagop@yahoo.com>
To: cslattery@maritime.edu
Cc: "Jeffrey B. Hagopian" <jbhagop@yahoo.com>

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Please tell me why you sent this and why I am the subject of your "no trespass" order.
I look forward to hearing from you.

Sincerely & respectfully,

Captain Jeffrey B. Hagopian
Massachusetts Maritime Academy - Class of 1988
Cell: 978-764-3908
Email: jbhagop@yahoo.com

10/6/2021, 2:04 PM

The Commonwealth's
Leadership University

Christopher Slattery <cslattery@maritime.edu>

Official Report of Threat/Request for Investigation1 message

jeff hagopian <jbhagop@yahoo.com>

To: cslattery@maritime.edu

Cc: "Jeffrey B. Hagopian" <jbhagop@yahoo.com>

Thu, Sep 16, 2021 at 11:47 AM

Dear Chief Slattery,

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As the Chief of Police for the Massachusetts Maritime Academy I am respectfully requesting that you commence an investigation into this matter.

Thank you, Chief Slattery.

Sincerely & respectfully,

Captain Jeffrey B. Hagopian
Massachusetts Maritime Academy - Class of 1988
Cell: 978-764-3908
Email: jbhagop@yahoo.com

EXHIBIT F

L A M P E R T
H A U S L E R
R O D M A N
PROFESSIONAL CORPORATION



10 NORTH ROAD
CHELMSFORD, MA 01824
TELEPHONE 978-256-6080
FACSIMILE 978-256-0515

November 3, 2021

By Email and By Mail

Chief Christopher Slattery
Massachusetts Maritime Academy
101 Academy Drive
Bourne, MA 02532

RE: Capt. Jeffrey B. Hagopian/Notice of Trespass

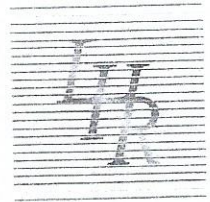
Dear Chief Slattery:

Our office has been retained by Capt. Jeffrey B. Hagopian ("Hagopian") to assist him in resolving the Notice of Trespass dated September 10, 2021 sent to him under your signature. Please direct all future correspondence relating to this matter directly to me on behalf of Capt. Hagopian.

First, there is a significant concern that there was no basis in fact or under applicable law for you to have sent the Notice of Trespass letter prohibiting Hagopian from coming onto any land or buildings of the Massachusetts Maritime Academy. It is remarkable that any such notice would be sent when there has been no investigation much less any contact with Hagopian relating to this notice. As a graduate of this public institution, Hagopian takes pride that he is a graduate of this institution and has maintained a strong connection with the University long after his student days. Indeed, he attended a public-invitation event entitled "A Survivor's Story" on September 9, 2021 at Admiral's Hall that evening. He had a conversation with a Board Member, Geoffrey Wilkinson, who apparently took exception to a comment or statement made by Hagopian and thereafter created some narrative to cause you to issue the notice. It would also appear that you issued the notice without the courtesy of discussing or investigating the underlying facts because if you had done so it would likely have caused you to investigate the threat by Wilkinson directed to Hagopian in the same conversation.

As you are well aware or should be aware, Hagopian faces potential criminal charges and/or fines simply if he appears to any University event – be it a sports event, fundraiser, discussion group or any other event sponsored by the Academy. There is no basis to support any reason for Hagopian to be subject to such restrictions which you created only after receiving one (1) side of the story. The mere issuance of the order without any substantive fair investigation is at best inappropriate and, more likely, was intended to chill Hagopian's right to express a criticism to a public-appointed Trustee of a public university. The order was simply a retaliation

November 3, 2021
Page Two



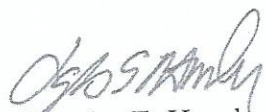
by a thin-skinned present Trustee who overreacted to a comment made in an ordinary speaking voice in a private conversation at a public setting.

I respectfully request that you revoke the order forthwith. If you are unwilling to do so, there will be little choice but to pursue injunctive relief against the Academy to prevent you and any other officers from any enforcement of the trespass order banning Hagopian from the Academy's buildings and public grounds. It cannot be seriously contested that Hagopian's rights of free speech and assembly are being compromised by your order. Hagopian has the right to attend any public forum at an Academy-sponsored event that is generally open to the public. Your order is too broad and acts as an unfair constraint that has no reasonable boundaries and apparently has no legitimate end other than to satisfy a Trustee who did not agree with a comment made by Hagopian. Mere disagreement does not constitute a valid basis for any such order to issue.

The order should never have been issued. It unfairly regulates my client's rights to a physical presence in a public forum or event on public property. There was no effort to tailor the order or otherwise limit its scope. Hagopian did not disrupt any event. He did not harm any property of the Academy. Indeed, he has not been cited with allegedly violating any Academy policy nor did he injure or cause anyone to be injured. There was no breach of the peace. The order is no more than a blanket restriction denying Hagopian's rights to use and enjoy the Academy and its various functions/events. Its results extend beyond the boundaries of the Academy. The mere existence of the order raises a presumption that Hagopian engaged in conduct that required any such order. It is unfair and likely illegal. It was designed to prevent Hagopian from having the right to participate in all Academy functions or events with no viable alternatives. It is odd that a public institution that encourages discussion and debate would immediately allow any such order to issue here, especially when Hagopian was not granted any right to participate in an evaluation if any such order was necessary at all.

I trust that you will reconsider the need for any such order and thereafter revoke it. In any event, I ask you to provide a written response to me on or by November 20, 2021 so we may resolve this matter.

Sincerely,



Douglas E. Hausler

Cc: Capt. Jeffrey B. Hagopian (by email)
Admiral Francis A. McDonald (by email)
Dr. Shannon Finning (by email)
Jessica Waters, Chairwoman (by email)
Brian J. Connor, Vice-Chairman (by email)